

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF GEORGIA  
BRUNSWICK DIVISION

CR221-0013

UNITED STATES OF AMERICA

v.

YORDON VELAZQUEZ VICTORIA

U. S. DISTRICT COURT  
Southern District of Ga.  
Filed in Office

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2-3-20 21  
Deputy Clerk

) INDICTMENT NO. \_\_\_\_\_  
)  
) 18 U.S.C. § 1594(b)  
) Conspiracy to Engage in Forced  
) Labor  
)  
) 18 U.S.C. § 1589(b)  
) Forced Labor  
)  
) 18 U.S.C. § 1592(a)  
) Unlawful Conduct with Respect to  
) Documents in Furtherance of Forced  
) Labor  
)  
) Forfeiture Allegation

THE GRAND JURY CHARGES THAT:

COUNT ONE

*Conspiracy to Engage in Forced Labor*  
18 U.S.C. § 1594(b)

Beginning at a time unknown to the Grand Jury, but at least from on or about February 3, 2020, and continuing through on or about October 6, 2020, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by others known and unknown, with some joining the conspiracy earlier and others joining later, did knowingly and willfully combine, conspire, confederate and agree with other persons known and unknown to the Grand Jury, to commit an offense against the United States, that is, did knowingly benefit financially from participation in a venture which has engaged in the providing and obtaining of labor and services by unlawfully charging foreign workers to obtain an H-2A visa and by

unlawfully withholding their identification documents, by means of the abuse and threatened abuse of law and legal process and by means of a scheme, plan, and pattern intended to cause foreign workers to believe that, if such foreign workers did not perform such labor and services, that the foreign workers would suffer serious harm or physical restraint in violation of Title 18, United States Code, Sections 2, 1589(b).

All done in violation of Title 18, United States Code, Sections 2 and 1594(b).

**COUNT TWO**

*Forced Labor*

18 U.S.C. § 1589(b)

Beginning at a time unknown to the Grand Jury, but at least from on or about April 9, 2020, and continuing through on or about October 6, 2020, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly financially benefit from participation in a venture which has engaged in the providing and obtaining of labor and services by unlawfully charging foreign workers to obtain an H-2A visa and unlawfully withholding their identification documents, by means of the abuse and threatened abuse of law and legal process and by means of a scheme, plan, and pattern intended to cause John Doe #1 to believe that, if John Doe #1 did not perform such labor and services, that John Doe #1 would suffer serious harm or physical restraint.

All done in violation of Title 18, United States Code, Sections 2 and 1589(b).

**COUNT THREE**

*Forced Labor*

18 U.S.C. § 1589(b)

Beginning at a time unknown to the Grand Jury, but at least from on or about February 3, 2020, and continuing through on or about October 6, 2020, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly financially benefit from participation in a venture which has engaged in the providing and obtaining of labor and services by unlawfully charging foreign workers to obtain an H-2A visa and unlawfully withholding their identification documents, by means of the abuse and threatened abuse of law and legal process and by means of a scheme, plan, and pattern intended to cause John Doe #2 to believe that, if John Doe #2 did not perform such labor and services, that John Doe #2 would suffer serious harm or physical restraint.

All done in violation of Title 18, United States Code, Sections 2 and 1589(b).

**COUNT FOUR**

*Forced Labor*

18 U.S.C. § 1589(b)

Beginning at a time unknown to the Grand Jury, but at least from on or about April 9, 2020, and continuing through on or about October 6, 2020, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly financially benefit from participation in a venture which has engaged in the providing and obtaining of labor and services by unlawfully charging foreign workers to obtain an H-2A visa and unlawfully withholding their identification documents, by means of the abuse and threatened abuse of law and legal process and by means of a scheme, plan, and pattern intended to cause John Doe #3 to believe that, if John Doe #3 did not perform such labor and services, that John Doe #3 would suffer serious harm or physical restraint.

All done in violation of Title 18, United States Code, Sections 2 and 1589(b).

**COUNT FIVE**

*Forced Labor*

18 U.S.C. § 1589(b)

Beginning at a time unknown to the Grand Jury, but at least from on or about April 9, 2020, and continuing through the return date of this Indictment, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly financially benefit from participation in a venture which has engaged in the providing and obtaining of labor and services by unlawfully charging foreign workers to obtain an H-2A visa and unlawfully withholding their identification documents, by means of the abuse and threatened abuse of law and legal process and by means of a scheme, plan, and pattern intended to cause Jane Doe #1 to believe that, if Jane Doe #1 did not perform such labor and services, that Jane Doe #1 would suffer serious harm or physical restraint.

All done in violation of Title 18, United States Code, Sections 2 and 1589(b).

**COUNT SIX**

*Unlawful Conduct with Respect to Documents in Furtherance of Forced Labor*  
18 U.S.C. § 1592(a)

Beginning at a time unknown to the Grand Jury, but at least from on or about April 9, 2020, and continuing on or about October 6, 2020, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly possess any actual or purported passport and any actual or purported government identification document of John Doe #1 in the course of a violation of Section 1589, with intent to violate Section 1589, and to attempt to prevent and restrict, without lawful authority, John Doe #1's liberty to move and travel, in order to maintain the labor and services of John Doe #1, when John Doe #1 was and had been a victim of a severe form of trafficking in persons.

All done in violation of Title 18, United States Code, Sections 2 and 1592(a).

**COUNT SEVEN**

*Unlawful Conduct with Respect to Documents in Furtherance of Forced Labor*  
18 U.S.C. § 1592(a)

Beginning at a time unknown to the Grand Jury, but at least from on or about February 3, 2020, and continuing on or about October 6, 2020, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly possess any actual or purported passport and any actual or purported government identification document of John Doe #2 in the course of a violation of Section 1589, with intent to violate Section 1589, and to attempt to prevent and restrict, without lawful authority, John Doe #2's liberty to move and travel, in order to maintain the labor and services of John Doe #2, when John Doe #2 was and had been a victim of a severe form of trafficking in persons.

All done in violation of Title 18, United States Code, Sections 2 and 1592(a).



**COUNT EIGHT**

*Unlawful Conduct with Respect to Documents in Furtherance of Forced Labor*  
18 U.S.C. § 1592(a)

Beginning at a time unknown to the Grand Jury, but at least from on or about April 9, 2020, and continuing on or about October 6, 2020, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly possess any actual or purported passport and any actual or purported government identification document of John Doe #3 in the course of a violation of Section 1589, with intent to violate Section 1589, and to attempt to prevent and restrict, without lawful authority, John Doe #3's liberty to move and travel, in order to maintain the labor and services of John Doe #3, when John Doe #3 was and had been a victim of a severe form of trafficking in persons.

All done in violation of Title 18, United States Code, Sections 2 and 1592(a).

**COUNT NINE**

*Unlawful Conduct with Respect to Documents in Furtherance of Forced Labor*  
18 U.S.C. § 1592(a)

Beginning at a time unknown to the Grand Jury, but at least from on or about April 9, 2020, and continuing on or about October 6, 2020, the precise dates being unknown, in Glynn County within the Southern District of Georgia, and elsewhere, the defendant **YORDON VELAZQUEZ VICTORIA**, aided and abetted by other individuals known and unknown to the Grand Jury, did knowingly possess any actual or purported passport and any actual or purported government identification document of Jane Doe #1 in the course of a violation of Section 1589, with intent to violate Section 1589, and to attempt to prevent and restrict, without lawful authority, Jane Doe #1's liberty to move and travel, in order to maintain the labor and services of Jane Doe #1, when Jane Doe #1 was and had been a victim of a severe form of trafficking in persons.

All done in violation of Title 18, United States Code, Sections 2 and 1592(a).

**FORFEITURE ALLEGATION**

The allegations contained in Counts One through Nine of this Indictment are hereby re-alleged and incorporated by reference for the purpose of alleging forfeiture to the United States of America pursuant to Title 18, United States Code, Section 1594(d).

Upon conviction of Count One, Count Two, Count Three, Count Four, Count Five, Count Six, Count Seven, Count Eight, or Count Nine of this Indictment, the defendant **YORDON VELAZQUEZ VICTORIA**, shall forfeit to the United States of America, pursuant to Title 18, 1594(d), any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such violation, and any property traceable to such property; and any property, real or personal, constituting or derived from, any proceeds that such person obtained, directly or indirectly, as a result of such violation, or any property traceable to such property.

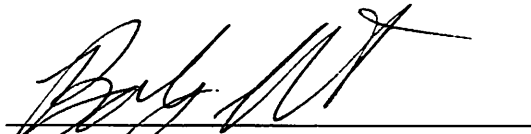
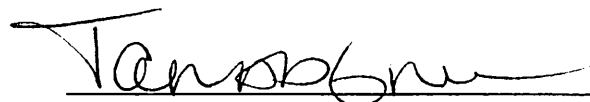
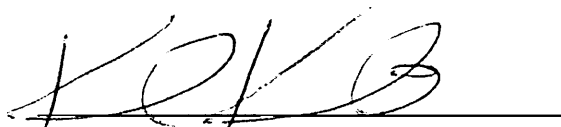
If any property subject to forfeiture as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461.

All pursuant to Title 18, United States Code, Section 1594(d)(2) and 2428, as incorporated by Title 28, United States Code, Section 2461.

A True Bill.

  
Bobby L. Christine  
United States Attorney  
Tania D. Groover  
Assistant United States Attorney  
\*Lead Counsel  
Karl I. Knoche  
Assistant United States Attorney  
Chief, Criminal Division